

**Definitions:**

**Agency:** Environmental Protection Agency

**Bankruptcy Proceeding:** The case styled *In re: Tronox Incorporated, et al.*, Case No. 09-10156 (ALG), in the United States Bankruptcy Court for the Southern District of New York.

**Covered Sites:** Any and all sites defined in Section II of the Environmental Settlement Agreement.

**Documents:** All memoranda, analysis, communications within the Agency, communications with other Agencies, communications with any of Governments that were signatories to the Environmental Settlement Agreement, and communications with Tronox. The term “Documents” excludes any pleadings or filings made with the court in the Bankruptcy Proceeding.

**Environmental Settlement Agreement:** The Environmental Settlement Agreement lodged with the court in the Bankruptcy Proceeding on or about November 23, 2010, by and among the United States of America, on behalf of the United States Environmental Protection Agency, the United States Department of Agriculture, acting through the United States Forest Service, the United States Department of the Interior, acting through the Fish and Wildlife Service and the Bureau of Land Management, the United States Department of Commerce, acting through the National Oceanic and Atmospheric Administration, the United States Department of Defense, including the United States Department of the Army, United States Army Corps of Engineers, United States Department of the Navy, and United States Department of the Air Force, and the Nuclear Regulatory Commission; the Navajo Nation; the States of Alabama, Florida, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Louisiana, Massachusetts, Mississippi, Missouri, Nevada, New Jersey, New York, North Carolina, Ohio, Oklahoma, Pennsylvania, Tennessee, Texas, and Wisconsin (collectively, the “**States**”); the City of Warrenville, Illinois, the City of West Chicago, Illinois, the Forest Preserve District of DuPage County, Illinois, the West Chicago Park District, DuPage County, Illinois, the City of Chicago, and the Chicago Park District (collectively, the “**Local Governments**”; the Local Governments and the United States, the States, and the Navajo Nation, collectively, the “**Governments**”). The Settlement Agreement is attached to this Request and additionally can be found at: <https://www.epa.gov/sites/production/files/2013-08/documents/tronox-sa.pdf>.

**Tronox:** Tronox Incorporated, Tronox Luxembourg S.ar.l, Cimarron Corporation, Southwestern Refining Company, Inc., Transworld Drilling Company, Triangle Refineries, Inc., Triple S, Inc., Triple S Environmental Management Corporation, Triple S Minerals Resources Corporation, Triple S Refining Corporation, Tronox LLC, Tronox Finance Corp., Tronox Holdings, Inc., Tronox Pigments (Savannah) Inc., and Tronox Worldwide LLC.